

## REMARKS

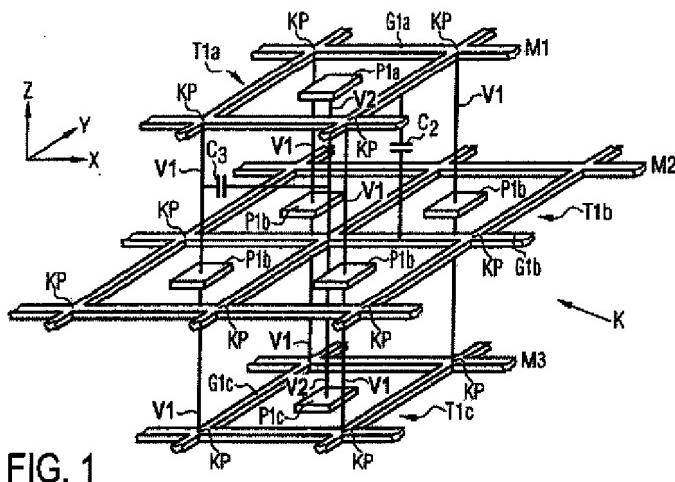
Claims 1-21 are pending in the application and claims 1, 3, 5, 11, 13 and 16 have been amended. No new matter has been introduced by the amendment.

Claim 13 has been amended to improve the form of the claim.

### Rejection Under 35 U.S.C. § 102(b)

Claims 1-21 have been rejected over Ng et al. This rejection is overcome in view of the amendment of claims 1, 3, 5, 11, 13, and 16, together with the following remarks.

The claimed component includes latticed metal regions configured in a regular pattern and electrically isolated regions within openings defined by the lattice. Claims 1, 11, and 16 have been amended to recite that the electrically conductive regions are electrically isolated from one another by the latticed metal region. An exemplary embodiment of the applicant's semiconductor component is shown below in FIG. 1 of the applicant's drawing. As illustrated in the exemplary embodiment, the metal leads of the substructure T1b in the latticed metal region G1b electrically isolate the electrically conductive regions Pb1 from one another in the substructure.



The applicant asserts that the claimed semiconductor component recited by the applicant's claim patentably distinguishes from the devices disclosed by Ng et al. The layers of interconnect metallization in the Ng et al. devices do not have electrically conductive regions in openings of a metal lattice that are electrically isolated from one another. In contrast to the applicant's claimed component, Ng et al. disclose capacitor structures having either a sole separate part (FIGs. 2-7, elements 75, 177) or electrically connected fingers. (See Col. 9, lines 53-59).

"As shown in FIG. 8, the capacitor structure 200 has a stacked structure similar to that of the first embodiment. However, each conductive layer is patterned to form a pair of electrodes. Each electrode comprises a main portion defining a plurality of elongate elements, i.e. fingers, each of which are interconnected at one end to form a comb like structure."

Accordingly, the applicant asserts that Ng et al. do not anticipate the pending claims because Ng et al. do not suggest or disclose each and every element of independent claims 1, 11 and 16.

Dependent claims 3 and 5 have been amended to recite that the electrically conductive regions are substantially vertically aligned above crossing points. The first and second substructures are offset and the electrically conductive regions are substantially vertically aligned with the crossing points of the metal leads. The applicant asserts that this feature is not suggested or disclosed by Ng et al.

Claims 2-10 are allowable in view of their direct or indirect dependence from claim 1, and because these claims describe further detail of the claimed semiconductor component.

Claims 12-15 are allowable in view of their direct dependence from claim 11, and because these claims describe further detail of the claimed semiconductor component.

Claims 17-21 are allowable in view of their direct or indirect dependence from claim 16, and because these claims describe further detail of the claimed semiconductor component.

Application No. 10/511,855  
Amendment dated June 12, 2008  
Reply to Office Action of April 18, 2008

The additionally cited references have been carefully considered and found not to be relevant to the applicant's pending claims.

The applicant has made a novel and non-obvious contribution to the art of semiconductor component design. The claims as issue distinguish over the cited references and are in condition for allowance. Accordingly, such allowance is now earnestly requested.

Respectfully submitted,

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